

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS

IN RE:

§  
§  
Life Partners Holdings, Inc. § 4:15-bk-40289  
§  
Debtor (s) § Bankruptcy Case No.  
§

**APPLICATION FOR PAYMENT OF UNCLAIMED FUNDS**

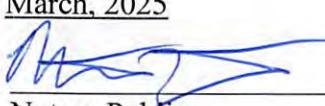
Comes now the undersigned, to make application for an order directing payment of unclaimed funds now on deposit in the Treasury of the United States. Claimant is a X creditor    debtor (check one) in the above captioned bankruptcy case and on whose behalf these funds were deposited:

1.	<b>Name of Claimant(s)</b>	Dilks & Knopik, LLC as assignee to James Robert & Tamara A. Graff
2.	<b>Name and Title of Authorizing Officer or Representative</b>	Andrew T. Drake – Vice President
3.	<b>Current Mailing Address</b>	35308 SE Center St, Snoqualmie, WA 98065
4.	<b>Telephone Number</b>	425-836-5728
5.	<b>SS# (last 4 digits only) or EIN #</b>	74-3049851
6.	<b>Amount Being Claimed</b>	\$3,976.51

I, Andrew T. Drake, do hereby state under penalty of perjury that I am legally entitled to claim these funds for whom the unclaimed funds were deposited into the treasury in the above referenced bankruptcy case. I certify to the best of my knowledge that all information submitted in support of this claim is true and correct.

Date: March 4, 2025 Claimant Signature: 

Subscribed and Sworn to Before Me this 4th day of March, 2025

  
\_\_\_\_\_  
Notary Public

In and for the State of WASHINGTON

My commission expires February 19, 2026



UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS

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§  
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**CLAIMANT HISTORY**

The original disbursement was not presented for payment within 90 days after issuance because:

Dividends were not collected by the creditor, James Robert & Tamara A. Graff. James R. and Tamara A. Graff have assigned their claim and the unclaimed funds to the claimant, Dilks & Knopik LLC, as evidenced by the attached Assignment Agreement and the Transfer of Claim filed on 03/04/2025 (Docket # 5793).

Claimant certifies under penalty of perjury that all statements made by Claimant in this application and any attachments required for this Application are, to the best of its knowledge, true and correct. Accordingly, Claimant request the Court to enter an Order authorizing payment of the pro rata dividend due upon this claim.

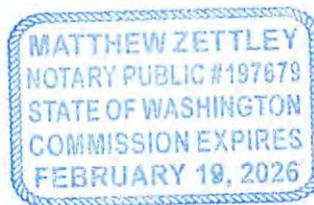
March 4, 2025

DATE



Andrew T. Drake, Vice President  
Dilks & Knopik, LLC  
35308 SE Center St  
Snoqualmie, WA 98065  
(425) 836-5728  
[admin@dilksknopik.com](mailto:admin@dilksknopik.com)

Subscribed and Sworn to Before Me this 4th day of March, 2025



Notary Public

In and for the State of WASHINGTON

My commission expires February 19, 2026

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS

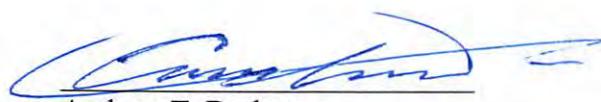
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§  
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**CERTIFICATE OF SERVICE**

In accordance with 28 U.S.C. § 2042, the undersigned hereby certifies that on the date designated below, a true and correct copy of the foregoing application with all required attachments was mailed to:

US Attorney  
Attn: Unclaimed Funds  
1100 Commerce Street, 3rd Floor  
Dallas, TX 75242

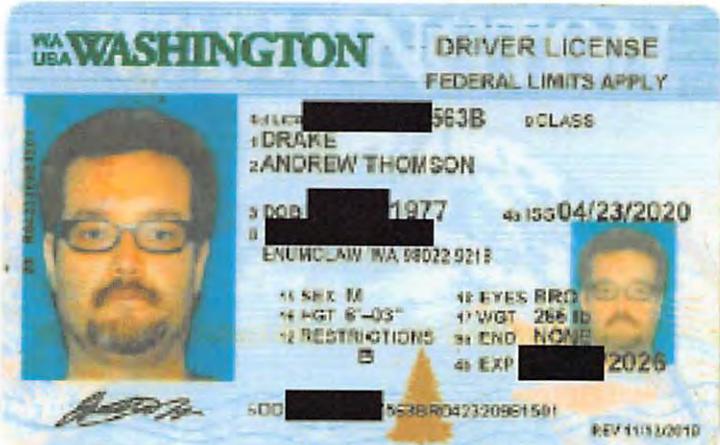
Date: March 4, 2025



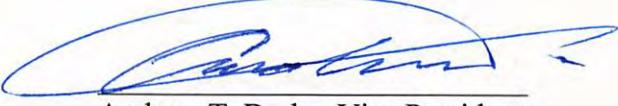
Andrew T. Drake  
Dilks & Knopik, LLC

AFFIDAVIT OF  
PHOTO IDENTIFICATION AUTHENTICITY

I, Andrew T. Drake, Vice President of Dilks & Knopik, LLC hereby certify that the below proof of identification is a true and accurate duplicate of the original.



Dated: March 4, 2025

  
Andrew T. Drake, Vice President  
35308 SE Center Street  
Snoqualmie, WA 98065  
(425) 836-5728

On March 4, 2025 before me, Andrew T. Drake, personally appeared, personally known to me to be the person whose name is subscribed to the within instrument and acknowledged to me that he executed the same in his authorized capacity, and that by his signature on the instrument the person, or entity upon behalf of which the person acted, executed the instrument. WITNESS my hand and official seal.



  
Matthew Zettley, Notary Public  
My commission expires: February 19, 2026  
Notary in and for the State of Washington

## U.S. Courts Unclaimed Funds Locator

[Home](#) · [About](#)

Court / TXNB

[Edit Search](#)

Case Number	15-40289	Page Total	\$10,598.60
Last/Business Name	Life Partners Holdings, Inc.	First Name	

Creditors | 5

Court	Creditor Name*	Amount
TXNB	James/Tamara Graff	\$3,976.51
TXNB	James Heye	\$1,025.20
TXNB	James Mitchell	\$853.14
TXNB	James/Lois Edwards	\$2,407.33
TXNB	James/Sheri Gopfarth	\$2,336.42

[First](#) [Prev](#) [Next](#) [Last](#)

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
155 Harvey G. Deharde	3,767.19
156 Haven Chiropractic Clinic 401K Profit Sharing	1,651.02
157 Hazel L Angell	2,231.65
158 HDH Holdings, LLC	937.14
159 Heather G. Rowles	1.37
160 Helene J. Goldfarb	34,962.05
161 Henry G. Witkowski Trust	4,843.38
162 Henry L Rosauer	914.64
163 Herbert K Bennett Living Trust	21,584.59
164 Herman Living Trust	3,996.65
165 Hollins Living Trust	4,343.53
166 House Of Seven Gables	1,098.26
167 Howard G Saxton	2,520.67
168 Huron Trust Organization	1,662.81
169 IRA Services Trust Company FBO Carla Chisholm Acct: IRA46565	1,389.21
170 IRA Services Trust Company FBO William D Chisholm Acct: IRA046577	1,389.21
171 Isabel Tacuyan	14,607.91
172 J & M Whisler Revocable Living Trust	1,687.88
173 J. O. Hill Family Ltd. Partnership dtd: 05/30/97	931.14
174 Jack A. & Beverly A. Beazley Family Trust	4,884.94
175 Jack Magness	1,922.37
176 Jacqueline E Stern	10,102.83
177 Jade & Stefani Webster	2,988.60
178 Jaime S. Lopez	6,447.05
179 James & Carma Pruett	30,659.01
180 James & Lois Edwards	2,407.33
181 James & Sheri Carlton Gopffarth	2,336.42
182 James Andrew Cox	5,003.21
183 James C. Heye	1,025.20
184 James Edward McNamara	3,895.53
185 James Lowe	31,393.25
186 James Robert & Tamara A. Graff	3,976.51
187 Jan Stuckman	853.74
188 Jane Bennett	5,390.15
189 Janice O & Ronny G Bryant	4,676.05
190 Janice S Beck	1,014.46
191 Janna & Cullen Johnson	1,179.34

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

**Payments Totaling \$ 3,297,177.47**

<b>Investor Name</b>	<b>Amount (USD)</b>
1 2002 The Doris M. Paretsky Revocable Living Trust	3,097.01
2 Addis W. & Dana Hargrove	30,233.94
3 Albert & Elaine Gallegos Trust	948.33
4 Albert Stone	10,008.56
5 Alex W. Eastwood	2,437.33
6 Alexander A. Lambert, III	2,142.52
7 Alton F & Elsie M Schoepke Trust	2,746.92
8 Amanda Smith	7,336.41
9 Ambrogio Adamoli	3,825.90
10 Andrew & Shelley Scraver	15,911.41
11 Angela Riano & Alfonso Cuellar	2,060.03
12 Anita Meri Varricke Trust	1,071.26
13 Ann Aknin	1,289.80
14 Anthony J. Dimino	4,385.74
15 Anthony M. Pryor	955.13
16 Antoine Cason	15,715.16
17 Arthur F. Mack, Jr.	8,875.17
18 Arvelle Lanch	19,729.38
19 Ashly Paloutzian	10,712.59
20 Aurora S. Relatores	1,107.47
21 Austin & Sherrie Baker III	1,980.33
22 Babak Rejaie	3,693.92
23 Barbara Campbell	22,158.78
24 Barbara Chastain	1,256.16
25 Barbara Staley	1,306.94
26 Barbara A Vosburg	1,642.24
27 Barbara J. Lemay	9,164.84
28 Barbara J. Priestley Revoc. Living Trust	1,338.86
29 Barbara L. Goetsch	1,389.64
30 Barbara M Hammel	4,760.03
31 Barbara T. Russell	5,879.29
32 Barry M Kilzer	4,120.06
33 Barwick Imports Emp. PSP	1,087.33
34 Becky Roberts	3,895.53
35 Beverly J. Hansen	2,755.49
36 Beverly P. Sherman Irrevocable Trust	1,306.51
37 Bill & Cheryl L. Bragg	17,313.26

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
38 Billy G. Cox	10,403.00
39 Bird Nest Trust	9,648.40
40 Brad D. Hudson	2,892.40
41 Bradley Joel Martin	8,410.46
42 Brady Dawkins	2,380.55
43 Brenda L. Britten	31,136.58
44 Brian Anderson Beach	948.49
45 Brigham & Julie Graham	4,638.55
46 Broad Acre Collection Trust	33,423.72
47 Bryan E Quigley	2,613.87
48 C.J. & Lillian Klingsmith	1,059.48
49 Callen Renee Gentry Irrevocable Trust	226.46
50 Carlise M Swet	1,165.32
51 Carmen & Frances Desanti	1,671.81
52 Carol Marriott	5,587.05
53 Carol A Chappell	1,204.74
54 Cary & Paige Greene	2,259.50
55 Chad Clark Whitaker	1,507.69
56 Chandler Kate Gentry Irrevocable Trust	226.46
57 Charles Payne	22,593.93
58 Charles W. Estes	20,271.44
59 Charles Walker	3,347.69
60 Charlot F Van Hoose	32,966.50
61 Chesley Scott Johnston Trust	1,270.08
62 Chester O. & Jean E. Magnuson	2,380.98
63 Christopher G. Rowles	1.37
64 Clay & Melinda Rose	15,026.98
65 Coker Pump & Equipment PSP	2,565.24
66 Coleen Koester	1,962.33
67 Connie Cay Miller	1,090.97
68 Corey R. O'Brien	3,570.94
69 Cory Masao Taam Trust	810.08
70 Courtneyann Elizabeth Taylor Trust	3,693.92
71 Cynthia R. Springs	7,661.22
72 D.A. Summers & Assoc., Inc. MPP	8,323.04
73 Danielle E. Dennis	1,101.25
74 David Hecht	2,612.80
75 David Laber	2,554.59
76 David Yeh	17,410.32

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
77 David & John Welch	8,032.94
78 David A. Johnson	17,783.98
79 David Scott Eriksson	5,824.01
80 Deanna M. & David H. Findley	5,674.03
81 Deborah J. Overdorff	1,285.51
82 Deborah M. Holubec	1,409.35
83 Debra R Oliver	1,847.07
84 Denise Marie Eckman	4,715.04
85 Dennis & Coleen Saggese	2,491.32
86 Desert View Trust	5,307.63
87 Diane A. & William C. Lampe	2,443.33
88 Dianne L Fisi	1,373.14
89 Dillon G. Davis	1,499.76
90 Diversified Life Investments, LP	37,420.80
91 Donald & Bernadette Keeling Family Trust	3,372.32
92 Donald F. Lett	30,755.64
93 Donald H. Westbrock	4,890.30
94 Donald J Taplin	3,890.39
95 Donald T. & Karen L. Carter	1,847.98
96 Doris Sivernell	15,947.84
97 Dorothy & Clyde Martin	15,391.85
98 Double B Crop Insurance Agency, Inc.	5,775.37
99 Douglas W. Vibrock	8,218.49
100 Dr. Moe Bishara	1,900.63
101 E. Ruth Barrett Living Trust	2,549.17
102 Earl Howery	3,455.88
103 Ed & Linda Heaton	1,095.68
104 Edgar & Emily Hibbard	1,315.72
105 Edgar R. Taylor	1,158.67
106 Eileen J Schimp	2,412.48
107 Eileen M Stuart	3,568.92
108 Eliza C. Shedd Revocable Trust	3,261.13
109 Elizabeth Orlowski	3,570.94
110 Emil L Frohlich	3,771.05
111 Eric Cave	3,584.86
112 Ernest Clayton	7,450.82
113 Eshleman Family Living Trust	1,967.26
114 Estate of Harriet A. Moyer	8,556.58
115 Estate of James L. Mitchell	853.14

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
116 Estate Of Myron Melvin, Jr.	2,641.73
117 Estate Of Robert Alvarez	1,363.50
118 Estrella C. Prado	7,751.20
119 Eva Vagner Inter Vivos Trust	2,750.14
120 Evan Arthur Birkby	11,946.68
121 Evan R. Gage	16,456.47
122 Family Trust Of Valeria L Jordan	5,988.13
123 Federico Fernandez B & Ladis P Rodriguez Baute	473.28
124 Fenton L. L. Bowers	5,284.95
125 Fernando Rodriguez	11,146.67
126 FIME (USA) International LTD	12,242.99
127 FISERV fka Pensco Trust Company FBO Mary E Propst Acct: 031037996650	1,404.85
128 Flint Immel	24,363.65
129 Flint Immel	1,099.54
130 Floyd R. Hendrick, III	4,276.68
131 For the Cause, LTD	48,776.15
132 Francis D. Calli	1,128.53
133 Frank J Bargers	5,223.46
134 Frank Or Doris Cote	1,214.81
135 Frederick A. Roberts	32,580.42
136 Gary D. & Melody A. Lawrence	3,437.89
137 Gary Gandy	56,258.04
138 Gary Mehlberg	7,047.81
139 Gary S. Cassill	2,094.10
140 George C. Gallinari	15,182.31
141 George E. Hyde Family Revocable Trust	4,165.91
142 Gerald A Bridwell	1,245.66
143 Gilbert Oswald	1,625.74
144 Glenn A. Liberatore	0.15
145 Gloria Elena Giraldo Isaza	4,794.74
146 Gloria Mighell	39,444.19
147 Grace K. Kim	2,673.65
148 Grant Carrabba	13,647.84
149 Gregory S. Ashlock	15,929.41
150 Guilford G. Gurk	1,639.46
151 Halfhill Family Trust	1,502.98
152 Harlan L. Willis	29,170.39
153 Harold & Jamie L. Norman	1,120.11
154 Harriet B Bothof & Ruth Gregg	2,434.54

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
192 Jeanne Scholz-Denman	4,178.13
193 Jeff S. Garrett	1,771.43
194 Jeffrey & Susan P Whitman	4,719.75
195 Jeffrey Lynn Beard	1,175.60
196 Jennifer A Elshoff	16,354.92
197 Jennifer Wilkins	4,703.26
198 Jenny R Clary UGMA	48.38
199 Jenny R Clary UGMA	124.74
200 Jenny R. Clary UGMA	1,649.74
201 Jerry Jordon	2,366.20
202 Jerry Vorheis	1,356.86
203 Jerry Don Gentry Irrevocable Trust	453.14
204 Jessica Heagerty	14,034.10
205 Jessie Landmon Zamora	1,078.97
206 Joan K. Collins	7,416.33
207 Joe Hathaway	7,759.35
208 Joe Michael Cobb	1,356.86
209 Joel & Connie Voss	1,006.56
210 John And Victoria Twedt	4,017.22
211 John B. Waag, Jr.	2,492.18
212 John M. Fowle	4,407.16
213 John R. & Winnie L. Osborne	33,106.62
214 John S. Mitchell	24,712.24
215 John W. Sullivan	6,413.63
216 Johnny & Shirley Paul Revocable Trust	7,262.50
217 Johnny D. Johnson	962.42
218 Jon Winand	1,286.01
219 Jose Fernel Garavito Arenas	16.60
220 Joseph Kowal	31,412.32
221 Joseph Kowal	5,843.29
222 Joseph Narez	2,264.86
223 Joseph M Aprile	1,075.55
224 Josephine Tompkins Trust	1,250.80
225 Josey W. Parks	3,956.16
226 JSJK, LLC	5,288.16
227 Judith K. DeMott Revocable Trust	12,025.74
228 Judy A. Flynn	3,461.88
229 Judy K LaFemina	114.82
230 Judy K LaFemina	143.79
231 Judy L Baily	16,193.37

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
232 Julian B. MacQueen	7,087.24
233 Julie D Hamilton	2,472.25
234 Kandy L Whatley	1,947.76
235 Karen L. Bean	4,583.49
236 Karen S. Toland	36,358.35
237 Karin Douglas	3,390.11
238 Katherine J Pechmann	1,034.62
239 Kathleen Schuler	6,468.26
240 Kathryn Bess Pittman Renfro	2,865.19
241 Keller Construction P.S.P., Raymond Keller	1,336.93
242 Kelly Community Federal Credit Union FBO Tamitha Michelle Chapman TRAD IRA Acct: CID# 6919	658.40
243 Kenneth Paddie	1,306.51
244 Kenneth Copeland Ministries	92,098.73
245 Kenneth Dale Bayles	16,164.23
246 Kenneth E Kredit	1,435.27
247 Kenneth M. Fry	2,056.82
248 Kent Mosher	3,710.27
249 Kerry L Groves	9,048.28
250 Kevin A. Pryor	955.13
251 Kirk Willis	1,302.87
252 KJTM #1	7,374.76
253 Ladd M. Lavallee	901.36
254 Lancaster Revocable Living Trust	4,081.28
255 Landon S. Gage	16,456.47
256 Larry D. Null	2,066.89
257 Larry Semenza	5,957.92
258 Lauren M. Smiley	1,304.79
259 LaVern J. & Judith A. Wegner	3,976.09
260 Lee (Charles) Cox	12,501.38
261 Leo & Mildred Gukeisen	2,891.33
262 Leonard D. McCoy	5,875.86
263 Leora M. Wells	912.93
264 Leroy & Kathleen Sargent Trust	2,562.45
265 Leroy & Ruth Wall	1,354.50
266 Lewis E Hurwitz Trust	1,343.36
267 Lewis King	1,257.66
268 Lewis L. Wright Jr. Family Trust	4,402.45
269 Lillian H. & Richard A. Creasy, Sr.	974.85

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
270 Ling L. Kao	7,594.59
271 Lois M Frost	1,087.14
272 Lois S. Williams	16,140.23
273 Loren & Jean Howe	2,579.59
274 Loretta A Bickel	4,025.06
275 Louis Varljen	1,817.93
276 Louis & Marie Dhority	917.64
277 Lynell Lucas	5,374.51
278 M.R. Reifke Revoc. Trust	1,893.34
279 Maier Advertising Inc. PSP	1,338.65
280 Mann Heritage, LP	36,829.47
281 Marcia K. Snook	983.20
282 Marcus & Geraldine Fisher Revocable Living Trust	1,428.63
283 Marjorie M. Quimby	905.45
284 Mark Lauzen	1,122.04
285 Mark C. Johannessen	6,527.18
286 Mark J Whisler	1,001.34
287 Mark J. Brorman	18,374.45
288 Mark Thomas Lenox	9,150.48
289 Martha Felan	7,713.07
290 Martha Juarez	1,522.62
291 Martha C. Bailey	4,528.43
292 Mary Ann & Robert Wilson	3,888.03
293 Mary Ellen Allday	5,053.13
294 Mary L Troe	875.65
295 Maryann Cabo	1,518.62
296 Maryann Monteferrante & Anthony Buscemi	2,255.19
297 Maurean McCann	1,123.97
298 Maverick S. Garrett UGMA	389.51
299 Melinda Anderson & Donna M. Padgett	897.29
300 Merle P. Christensen Trust	20,256.66
301 Michael & Gayla Wingate	1,947.76
302 Michael Scott Dabney	1,379.57
303 Michel H Zweig	1,428.20
304 Michelle D'Amore	1,251.45
305 Mike & Barbara Bomgardner	7,613.44
306 Milton & Billie Turner	2,965.25
307 Minh Chau Alvin Nguyen	3,142.22
308 Mosaic Management Group, Inc.	1,140.68

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
309 Muriel E. Gray	189.83
310 N.H.F. FBO T.G.I.F. Foundation	3,375.11
311 Nadine Fry Ruddy	23,272.04
312 Nailin Lu & Weijen Chen	18,757.75
313 Nancy Dalangin	20,991.54
314 Naomi Campbell	1,141.96
315 Nellie D. Beckley Trust	2,460.68
316 Nicholas J. & Georgia Zikos	11,069.96
317 Nick & Marianela Inchausti	18,000.16
318 Norma M Hill	22,956.44
319 Norman & Jeannette Anderson	2,244.29
320 NTC & CO, Agent LT, Custodian FBO Susan J Dow Acct:	1,975.40
321 Orval & Sally Peterson	6,139.39
322 Paige A Brown	1,947.76
323 Patra Services, Inc., TTEE FBO Forest Group	3,920.81
324 Patricia Middleton	1,531.04
325 Patrick & Maribel Dowd	33,598.76
326 Paul Gittemeier	1,590.61
327 Paul E Abernathy	2,819.13
328 Paul H. Neimeier	1,947.76
329 Paul M. Watson	15,563.90
330 Paul W. Farnan	1,568.11
331 Paulina Harrington	19,421.07
332 Pedro C. Santiago III & Heather L. Santiago	3,570.94
333 Peggy H Farris	29,425.24
334 Peterson Family Trust	1,304.79
335 Phyliss S. Cole	12,496.03
336 Potter Living Trust	3,569.65
337 Prentice Anderson	5,134.12
338 Rachel F O'Neal	270.54
339 Rachel F O'Neal	402.59
340 Rachel F O'Neal	338.77
341 Rachel F O'Neal	270.25
342 Rachel Hubbard Estate Trust	9,159.48
343 Randie K. Musico	36,971.51
344 Randy Smith	0.07
345 Rasik Patel	4,285.04
346 Raymond W Lundberg V.M.D	1,556.97

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
347 Regina Howard Yarbrough	878.86
348 Reynold K. Kim	2,695.50
349 Richard & Marie Myszka	990.91
350 Richard & Mary Veazey	7,018.68
351 Richard & Mary Slyfield	1,829.07
352 Richard Allen & Melissa Ann Cote	4,407.80
353 Richard E Walz	1,157.17
354 Richard Murphy PSP	1,358.29
355 Richard Murphy Retirement Plan	472.67
356 Richard&Judy Walker Family Trust	11,477.69
357 Rick Curtis	8,556.78
358 Ricky Alan Davis	2,999.53
359 Rita C Miller	3,551.44
360 Robbie R Kell	15,613.52
361 Robert Frager	2,142.52
362 Robert & Helen Szana	1,171.33
363 Robert & Jane Youngblood	3,150.79
364 Robert & Vanessa Lewis	1,465.48
365 Robert King Coke	6,310.79
366 Robert M Brooks	11,469.33
367 Robert M. Ross	880.58
368 Robert Parish	6,838.92
369 Robert Rae Patterson	1,256.37
370 Robin A. Tucker	50,750.91
371 Rodica Feldman	1,407.85
372 Rodney Pacheco Living Trust	9,054.93
373 Rodolfo F. Arca	21,306.28
374 Roger L. Stockbauer	4,132.06
375 Roger W. & Estelle Sherman Living Trust	1,338.86
376 Ronald Mays	11,262.58
377 Ronald E. Maser	1,787.22
378 Ronald Huffstetter	2,978.10
379 Ronald J Kosiba	3,094.01
380 Ronald L Spacht	1,619.74
381 Ronald L Teed	2,158.59
382 Rory E. Sterling	3,895.53
383 Rosezetta M Adams	3,619.36
384 Rowland Bateman	1,983.76
385 Roy & Jessie Roth	6,477.26
386 Ruby A. Brier Rev. Living Trust	14,286.10

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
387 Rushi Master	4,285.04
388 Russell Bjorkman, II	52,976.34
389 Russell E. Miller Trust (A)	2,071.81
390 Sandra Clement Massey	3,801.90
391 Sarah Bacon	9,886.65
392 Saucier Living Trust	1,119.25
393 Sawan Bryan	1,883.06
394 Schubrooks 316 Investments LLC	2,960.53
395 Scott C. Alexander	3,895.53
396 Sears Methodist Ret. System Inc FBO JS Thompson	7,959.88
397 Shannon D. Tipton	958.56
398 Shari S Kralik	3,200.49
399 Sharon Ames	2,960.53
400 Sharon Y. Blackman	2,329.87
401 Shelly K. Broline	535.63
402 Sheryl Jarrett	1,291.30
403 Shirley A. Sneed	10,032.34
404 Shirley Gregory	2,713.93
405 Shirley W Miller Estate	5,192.82
406 Shokou Investments, LLC	4,652.26
407 Solomon Alade	6,470.83
408 Sonya Renee Foote	3,570.94
409 Soo Goh-Baus	14,335.16
410 South Seminole Co. VFW Post 8207	3,200.28
411 Southeast Missouri Ent. Consultants	5,949.99
412 St. Olaf Properties	908.43
413 Stanley Kasper	1,159.32
414 Steven L. Edwards	6,591.46
415 Stewart Hunter	2,932.25
416 Susan Brodeur	8,094.01
417 Susan C. & Michael L. Kasper	6,866.99
418 Susan E. Cooley	15,962.19
419 Suzanne Groff Lierz	6,987.61
420 Tereasa A Bajnath	1,545.40
421 Teresita A.C. Poblador	10,930.27
422 Terrence O Ward	51,918.37
423 The Daniel & Patricia La Fleur Estate Trust	13,201.13
424 The Daniel L. and Bernice J. Englander Trust	2,776.28
425 The Estate of William Ronald Langley	2.94
426 The Estes Revocable Trust	6,530.40

## SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT

<b>Investor Name</b>	<b>Amount (USD)</b>
427 The Jack H.Coker Revocable Trust	7,408.83
428 The Johnson Revocable Trust	931.16
429 The Newlove Family Trust dated 3-4-1994	15,282.80
430 The Ralph A. Douglas & Lamoyan B. Douglas ILT	31,319.55
431 The Rullo Trust	1,947.76
432 Thetis M. Group & Joan I. Roberts	7,854.04
433 Thomas A. Leister Revocable Trust	1,915.63
434 Thomas C. & Laura S. Magee	7,466.46
435 Thomas C. DeYoung	26,884.54
436 Thomas E Ruhe	7,750.13
437 Thomas E. Hamilton	2,892.40
438 Timothy P Crawford	1,058.35
439 Timothy W. Terry	882.29
440 Tonya D Thrash	156.15
441 Tracy W. Griffin	7,498.81
442 Treva Fike	2,575.52
443 True & Sue Le Mon	11,755.36
444 Ui And Hyon Kim	5,102.41
445 Venita & Ronald Gene Brooks	14,680.32
446 Vern Hubers	2,258.00
447 Vern W. Tenney Trust	1,214.81
448 Victor K. Baus III	3,290.48
449 Victoria S. Patrinely	46,215.20
450 Violet Mae Ferdon Trust	912.82
451 Virgil & Darleen Pfeifer	1,567.68
452 Vitali Potapov	1,545.61
453 W & M Keith Family Revocable Trust	5,414.14
454 Wanda & Herman Karrick	1,904.48
455 Wayne Larsen	17,105.23
456 Wayne Homer Eason	5,206.32
457 WC Fl.Chap Myas Gra Asso. Of America Inc.	1,497.65
458 Weldon O. Jett	1,570.25
459 Whippletree, Ltd.	1,406.99
460 William & Mary Lou Strange	1,254.02
461 William C. Shuford, Jr. Legacy Trust	32,057.43
462 William G. Warren II	10,893.64
463 William H Rock III	10,712.59
464 William J. May, Jr.	11,249.72
465 William L. & Glenda S. Deal	895.79

## **SCHEDULE OF AMOUNTS FOR DEPOSIT INTO THE REGISTRY OF THE COURT**

<b>Investor Name</b>	<b>Amount (USD)</b>
466 William R. & Carrie A. Gill	959.42
467 William T. Hutto III	6,376.56
468 William Timothy Coombs	1,120.75
469 William W Gratrix	1,121.18
470 Windell Craig Perry	30,284.50
471 Winnie L. Osborne	6,606.03
472 Wyatt D. Davis	1,499.76
473 Yolanda Andrade C.	1,947.76
474 Yong P. Ho & Thu-Hang Thi Nguyen	7,141.66

Joshua L. Shepherd (Texas Bar No. 24058104)  
QUILLING SELANDER LOWNDS  
WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
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Facsimile: (214) 871-2111  
E-mail: jshepherd@qslwm.com

**COUNSEL FOR MICHAEL J. QUILLING, AS  
TRUSTEE OF THE LIFE PARTNERS POSITION  
HOLDER TRUST**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

<b>IN RE:</b>	<b>§</b>	
<b>LIFE PARTNERS HOLDINGS, INC., <i>et. al.</i></b>	<b>§</b>	<b>CASE NO. 15-40289-mxm11</b>
	<b>§</b>	<b>JOINTLY ADMINISTERED</b>
	<b>§</b>	<b>(Chapter 11)</b>
<b>Reorganized Debtors.</b>	<b>§</b>	
	<b>§</b>	

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**POSITION HOLDER TRUST'S FINAL REPORT, WITH REQUEST FOR  
(i) DISCHARGE, AND (ii) AUTHORITY TO DEPOSIT FUNDS  
INTO THE REGISTRY OF THE COURT**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN  
RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES  
BANKRUPTCY COURT AT THE ELDON B. MAHON U.S.  
COURTHOUSE, 501 W. 10TH ST., RM. 147, FORT WORTH, TX 76102-  
3643, BEFORE CLOSE OF BUSINESS ON DECEMBER 14, 2022, WHICH  
IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE  
CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE  
MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH  
HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH  
NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY  
REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE  
UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING  
THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

TO THE HONORABLE MARK X. MULLIN,  
UNITED STATES BANKRUPTCY JUDGE:

COMES NOW the Life Partners Position Holder Trust (the “PHT”), on behalf of the Reorganized Debtors under the terms of the Plan (as defined below), confirmed by this Court in the above-captioned, jointly administered, Chapter 11 bankruptcy cases (the “Bankruptcy Cases”) of Life Partners Holdings, Inc. (“LPHI”) and its affiliated debtors (collectively the “Subsidiary Debtors”, and then with LPHI, the “Reorganized Debtors”), by and through Michael J. Quilling, in his capacity as the Trustee of the PHT (the “Trustee”), and files this *Position Holder Trust’s Final Report with Request for (1) Discharge, and (ii) Authority to Deposit Funds into the Registry of the Court* (the “Final Report”), and respectfully states as follows:

**I. JURISDICTION AND VENUE**

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157, and venue is proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The statutory predicate for the relief sought herein is section 350(b) of title 11 of the United States Code (the “Bankruptcy Code”).

**II. BACKGROUND**

2. LPHI filed its voluntary petition for relief under Chapter 11 of Title 11, United States Code, §§ 101 et seq. (as amended, the “Bankruptcy Code”), with this Court on January 20, 2015 (“LPHI Petition Date”), thereby commencing LPHI’s Bankruptcy Case (the “Lead Case”).

3. On November 1, 2016, through its Confirmation Order [Dkt. No. 3439] (the “Confirmation Order”), this Court confirmed the *Revised Third Amended Joint Plan of Reorganization of Life Partners Holdings, Inc. et. al., Pursuant to Chapter 11 of the Bankruptcy Code* [Dkt. No. 3427] (as modified and including each of its exhibits, the “Plan”).

4. On December 9, 2016, the Plan became effective (the “Effective Date”). See Docket

No. 3615.

5. On June 7, 2017, the Chapter 11 Trustee filed his *Notice of Substantial Consummation* of the Plan. See Dkt. No. 4013.

6. Pursuant to the Plan, the PHT was established through the *Trust Agreement for Life Partners Position Holder Trust* (the “Trust Agreement”) dated December 9, 2016. Plan, Dkt. No. 3427, at Article V, and Position Holder Trust Agreement, at pp. 126-163; and Confirmation Order, Dkt. No. 3439, at ¶¶ 23-25. The Life Partners IRA Holder Partnership (the “IRA Partnership”) was also established through the *Company Agreement of Life Partners IRA Holder Partnership, LLC* (the “Company Agreement”), and also dated December 9, 2016. Plan, Dkt. No. 3427, at Article VII; and Confirmation Order, Dkt. No. 3439, at ¶¶ 28-29. The Trust Agreement and Company Agreement, along with the Plan and Confirmation Order will collectively be referred to as the “Plan Documents”.

7. Effective December 13, 2018, the Trustee became the successor trustee of the PHT<sup>1</sup>, taking over the position from Mr. Eduardo Espinosa (the “Original Trustee”), and he continues to serve in that capacity.

8. Under the terms of the Plan, the Trustee, as a Successor Trustee, is vested with the authority to act on behalf of the Reorganized Debtors with respect to matters relevant to the administration of the PHT. Plan, Dkt. No. 3427, at §§ 4.07, 4.10, 19.04, Appx. A (219, 234, 236, 237).

9. Accordingly, on March 3, 2021, the Trustee, acting on behalf of the Reorganized Debtors, filed the (i) *Position Holder Trust’s Amended Post-Confirmation Report and Joinder in*

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<sup>1</sup> For purposes of this Final Report, references to administration of the PHT also include management of the IRA Partnership.

*Amended Application for Final Decree Closing Bankruptcy Cases* [Dkt. No. 4546] (collectively with the *Creditors' Trustee's Final Report and Amended Application for Final Decree Closing Bankruptcy Cases and Related Relief* [Dkt. No. 4545], the "Applications for Final Decree"). The Applications for Final Decree requested that the Court close the Bankruptcy Cases.

10. On March 29, 2021, the Court granted the Applications for Final Decree and entered its *Order Approving: (I) Creditors' Trustee's Final Report and Amended Application for Final Decree Closing Bankruptcy Cases and Related Relief; and (II) Position Holder Trust's Amended Post-Confirmation Report and Joinder in Amended Application for Final Decree Closing Bankruptcy Cases* [Dkt. No. 4554] (the "Final Decree").

11. On May 23, 2022, the Trustee filed the *Position Holder Trust's Motion to Reopen Bankruptcy Case* [Dkt. No. 4558] (the "First Motion"). Through the First Motion, the Trustee sought to reopen the Lead Case for the purpose of seeking the Court's approval of the Trustee's intended winddown of the PHT, including the sale of the PHT's non-cash, policy related, assets. On June 16, 2022, the Court entered its *Order Granting Position Holder Trust's Motion to Reopen Bankruptcy Case* [Dkt. No. 4560], thereby reopening the Lead Case on that date.

12. With the Lead Case reopened, on June 21, 2022, the Trustee filed the *Position Holder Trust's Motion to Approve Plan Construction in Furtherance of Liquidation and Final Distribution* [Dkt. No. 4562] (the "Winddown Motion"). As part of the Winddown Motion, the Trustee sought to have the Lead Case immediately re-closed upon entry of the Court's Order on that Motion.

13. After conducting an evidentiary hearing on the Winddown Motion, on July 27, 2022, the Court entered its *Order Granting Position Holder Trust's Motion to Approval Plan Construction in Furtherance of Liquidation and Final Distribution* [Dkt. No. 4616] (the

“Winddown Order”). The Winddown Order re-closed the Lead Case effective July 27, 2022.

14. In anticipation of filing this Final Report, on November 16, 2022, the Trustee filed the *Position Holder Trust's Second and Final Motion to Reopen Bankruptcy Case* [Dkt. No. 4623] (the “Second Motion”) requesting that the Lead Case again be re-opened.

15. On November 17, 2022, the Court entered its *Order Granting Position Holder Trust's Second and Final Motion to Reopen Bankruptcy Case* [Dkt. No. 4624], thereby reopening this Lead Case.

### **III. FINAL REPORT AND REQUEST FOR RELATED RELIEF**

16. Pursuant to the Plan Documents, the Trustee, acting on behalf of the Reorganized Debtors, files this Final Report and respectfully requests the Court grant relief necessarily attendant to the Final Report, as outlined herein. Section 5.09 of the Plan mandates that “[u]pon the occurrence of the termination of the Position Holder Trust, the Position Holder Trustee shall File with the Bankruptcy Court, a report thereof, seeking to be discharged from his duties.” Plan, Dkt. No. 3427, at Section 5.09.

#### **A. Final Report**

17. Administration of the PHT for the benefit of its investors and other creditor beneficiaries has concluded. Specifically, the sale of the PHT’s non-cash, policy related, assets – as outlined within the Winddown Motion and approved by the Winddown Order – closed on September 6, 2022 (the “Sale”). Thereafter, on September 15, 2022, the PHT made a final distribution to its Investors<sup>2</sup> in the total amount \$265,532,960.05 (the “Final Distribution”).

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<sup>2</sup> The PHT previously had beneficiaries who were: (1) holders of Position Holder Trust Interests (“Units”); and (2) holders of IRA Partnership Interests (“Partnership Interests”). These Unit holders and holders of Partnership Interests are each referred to as an “Investor”, and collectively, the “Investors”.

18. As reported in the Winddown Motion, at inception of the PHT, the assets and the records relating to those assets were in a state of disarray. The Trustee immediately undertook efforts to correct those deficiencies, including through the optimization of policy premiums. Those corrections were accomplished, resulting in an increase in the value of the PHT's assets. Moreover, there were also many accomplishments with respect to the PHT's finances. For instance, all debt was eliminated, all unnecessary vendors were eliminated or replaced with better, more cost-efficient options, operating expenses were greatly reduced, and cash reserves were brought to proper levels.

19. The results of these efforts allowed the previous distribution of excess funds to investors each year as contemplated under the Plan Documents. These efforts also allowed for the Sale, which itself provided a resounding benefit to the Investors. Most of these Investors made their investment more than a decade ago, were elderly, and were suffering from significant investment fatigue. Virtually none of them wanted to still be holding their investment in 2022 (or beyond). The prospect of the Trust operating for another 9 to 10 years was very frustrating.

20. Instead, the Sale allowed the PHT to make the Final Distribution well earlier than originally contemplated by the Plan Documents - - adding to overall success of the PHT's administration. Specifically, since its inception to present, including the Final Distribution, the PHT has paid a total of \$360,532,960.05 in distributions to its Investors, a total of \$35.9 million to holders of New IRA Notes<sup>3</sup>, and an excess of \$340 million to the Continuing Fractional Holders. A successful outcome for all involved.

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<sup>3</sup> As that term is defined within the Plan Documents. Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms within the Plan Documents.

**B. Request to discharge Trustee and Trust Board**

21. The results obtained by the PHT, as outlined above, were based upon the efforts of the Trustee and the Position Holder Trust Governing Trust Board (herein, the “Trust Board”). In connection with this fulfilment of their respective duties, the Plan Documents state:

The duties, responsibilities and powers of the Position Holder Trust shall terminate after all Position Holder Trust Assets have been fully resolved, abandoned or liquidated and the Position Holder Trust Assets have been distributed in accordance with this Plan and the Position Holder Trust Agreement...

Plan, Dkt. No. 3427, at Section 5.09.

No Personal Liability. Any Persons dealing with the Position Holder Trust must look solely to the Position Holder Trust for the enforcement of any claims against the Position Holder Trust or to satisfy any liability incurred by the Trustee to such Persons in carrying out the terms of this Position Holder Trust, and neither the Trustee nor the Settlor or any other Person shall have any personal liability or individual obligation to satisfy any such liability, except to the extent that such liability of the Trustee is finally adjudicated by a court of competent jurisdiction to be the result of the Trustee’s willful misconduct, gross negligence, or fraud.

Plan, Dkt. No. 3427, Position Holder Trust Agreement, at pp. 126-163, Section 6.9.

No Personal Liability. Neither the Trust Board nor any member shall have any personal liability or individual obligation to satisfy any liability incurred by the Trustee, the Position Holder Trust, the IRA Partnership or its Manager, except to the extent that such liability is finally adjudicated by a court of competent jurisdiction to be the result of the Trust Board's, or its relevant member's, willful misconduct, gross negligence, or fraud.

Plan, Dkt. No. 3427, Position Holder Trust Agreement, at pp. 126-163, Section 7.12.

22. In connection with this Final Report, and as contemplated by the Plan Documents, the Trustee respectfully requests that the Court release and discharge the Trustee, the Original Trustee, and the Trust Board of and from any and all further duties, obligations, and liabilities with respect to the administration of the PHT, including but not limited to the discharge of and from any and all potential liability of the Trustee, the Original Trustee, Trust Board, and any current or former member of the Trust Board, for any debt of or liability arising from the administration of

the Plan Documents or PHT.

**C. Request to deposit the Unclaimed Funds into the registry of the Court**

23. Upon closing of the Sale and prior to the Final Distribution, by letter dated September 9, 2022, the Trustee provided an update to each of the Investors with respect to the then imminently forthcoming Final Distribution (the “Distribution Notice”). Within this Distribution Notice, the Trustee provided the following notice to Investors:

Checks will be placed in the mail on Thursday, September 15, 2022. The checks will be valid for 60 days and no longer. If you do not cash your check within 60 days your funds will be placed in the registry of the Bankruptcy Court, and you will then have to undertake a long and potentially expensive process to retrieve those funds.

**MAKE SURE YOU CASH YOUR CHECK DURING THE 60 DAY PERIOD.**

24. Thereafter, and in connection with the Final Distribution, each distribution check contained the following notice (the “Check Notice”):

**\*\*PLEASE DEPOSIT IMMEDIATELY\*\***

THIS CHECK IS VALID FOR 60 DAYS FROM THE DATE OF ISSUE. If you do not deposit this check by November 15, 2022, then you will have to ask the Bankruptcy Court for the money. Funds from all uncashed final distribution checks will be deposited with the US Bankruptcy Court for the Northern District of Texas, Fort Worth Division, under Case No. 15-40289-MXM-11, once the 60-day period is over. *In that event, you may have to hire your own lawyer to help you file the claim forms found on the Court's website at:*

[https://www.txnb.uscourts.gov/forms/all-forms/unclaimed\\_funds](https://www.txnb.uscourts.gov/forms/all-forms/unclaimed_funds)

25. The Distribution Notice coupled with the Check Notice had their desired effect as virtually all of the Final Distribution payments were timely deposited by the Investors. November 14, 2022 was the 60th day following the September 15<sup>th</sup> issuance of the Final Distribution checks. On November 16, 2022, after allowing for the clearance of every check received by the PHT’s bank on November 15<sup>th</sup>, the Trustee closed the last of the PHT’s bank accounts and obtained a cashier’s check for the total remaining and uncashed portion of the Final Distribution – a total of \$3,294,399.05 (the “Remaining Funds”). The cashier’s check constituting the Remaining Funds is

made payable to: "Clerk, US Bankruptcy Court".

26. Since closing the sole remaining PHT bank account and obtaining the cashier's check of the Remaining Funds, the Trustee received two checks, each in the amount of \$1,389.21, from an IRA administrator constituting return of Final Distribution funds that were originally wired by the PHT to the administrator on behalf of the two Investors (collectively, the "Returned Funds"). The Trustee is currently holding the total \$2,778.42 of Returned Funds for deposit into the Court's registry.

27. As contemplated by General Order 2016-03<sup>4</sup>, the Trustee respectfully requests that the Court enter an order allowing for the deposit by the Trustee into this Court's registry of (i) the Remaining Funds; (ii) the Returned Funds; and (iii) any and all additional returned funds that the PHT may receive from original recipients (collectively, with the Remaining Fund and the Returned Funds, the "Unclaimed Funds"). Based upon the PHT's records, the list of claimants to the Remaining Funds and Returned Funds are reflected on **Exhibit "1"**, attached hereto and incorporated fully by reference herein.

#### **D. Request to re-close the Lead Case**

28. As reflected herein, there are no remaining outstanding matters for the PHT, the Trustee, or the Trust Board in the Bankruptcy Cases. The PHT has been fully administered.

29. Section 350(a) of the Bankruptcy Code provides that "[a]fter an estate is fully administered and the court has discharged the trustee, the court shall close the case." 11 U.S.C. § 350(a). Rule 3022 of the Bankruptcy Rules, pursuant to which Bankruptcy Code section 350 is

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<sup>4</sup> General Order 2016-03 of the United States Bankruptcy Court for the Northern District of Texas (*at*: <https://www.txnb.uscourts.gov/content/general-order-2016-03> (last accessed November 21, 2022)).

implemented, provides that “[a]fter an estate is fully administered in a chapter 11 reorganization case, the court, on its own motion or on motion of a party in interest, shall enter a final decree closing the case.” Fed. R. Bankr. P. 3022.

30. Re-closing these Lead Case, as requested herein, is appropriate, and the Trustee respectfully requests that the Court’s Order approving this Final Report (the “Final Order”) effectuate that closure. The Trustee further respectfully requests the Court’s expedient consideration and approval of this Final Report, as entry of the Final Order needs to occur prior to December 31<sup>st</sup>, so as to avoid any question that the PHT terminated its existence prior to the new calendar year (and alleviate any requirement of tax or other filings attendant thereto). For the short while this Lead Case remains open, the PHT will file the requisite operating report and pay the corresponding quarterly fee to the Office of the United States Trustee.

#### IV. PRAYER

WHEREFORE, the Trustee respectfully requests that the Court enter an order (a) approving this Final Report; (b) discharging the Trustee, the Original Trustee, the Trust Board, and its members, as requested herein; (c) authorizing the deposit of the Unclaimed Funds into the registry of the Court and instructing the Clerk of Court to accept such funds; (d) immediately re-closing this Lead Case upon entry of the Final Order; and (e) granting the PHT, Trustee, Trust Board such other and further relief as to which they may be justly entitled, whether general, special, at law or in equity.

*[Remainder of page left intentionally blank]*

Dated: November 23, 2022.

Respectfully submitted,

**QUILLING SELANDER LOWNDS  
WINSLETT & MOSER, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
Telephone: (214) 871-2100  
Facsimile: (214) 871-2100**

By: /s/ Joshua L. Shepherd

Joshua L. Shepherd  
Texas Bar No. 24058104  
E-mail: [jshepherd@qlslwm.com](mailto:jshepherd@qlslwm.com)

**COUNSEL FOR MICHAEL J.  
QUILLING, AS TRUSTEE OF THE  
LIFE PARTNERS POSITION HOLDER  
TRUST**

**MICHAEL J. QUILLING, TRUSTEE**

/s/ Michael J. Quilling

Date: November 23, 2021

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 23, 2022, a true and correct copy of the foregoing document was served by electronic transmission via the Court's CM/ECF system upon all parties registered to receive electronic notice in this bankruptcy case, and by first-class mail, postage prepaid, upon those shown on the attached service list.

/s/ Joshua L. Shepherd  
Joshua L. Shepherd

B 2100A (Form 2100A) (12/15)

## UNITED STATES BANKRUPTCY COURT

Northern District of Texas

In re Life Partners Holdings, Inc.,

Case No. 4:15-bk-40289

### TRANSFER OF CLAIM OTHER THAN FOR SECURITY

A CLAIM HAS BEEN FILED IN THIS CASE or deemed filed under 11 U.S.C. § 1111(a). Transferee hereby gives evidence and notice pursuant to Rule 3001(e)(2), Fed. R. Bankr. P., of the transfer, other than for security, of the claim referenced in this evidence and notice.

Dilks & Knopik, LLC

Name of Transferee

Name and Address where notices to transferee  
Should be sent:

35308 SE Center Street  
Snoqualmie WA 98065

Phone: 425-836-5728

Last Four Digits of Acct #: \_\_\_\_\_

Name and Address where transferee payments  
should be sent (if different from above):

Phone: \_\_\_\_\_

Last Four Digits of Acct #: \_\_\_\_\_

James Robert & Tamara A. Graff

Name of Transferor

Court Claim # (if known): 13272-13343

Amount of Claim: \_\_\_\_\_

Date Claim Filed: \_\_\_\_\_

Phone: 361-935-5702

Last Four Digits of Acct #: \_\_\_\_\_

I declare under penalty of perjury that the information provided in this notice is true and correct to the best of my knowledge and belief.

By: /s/ Brian J Dilks - President  
Transferee/Transferee's Agent

Date: 3/4/2025

*Penalty for making a false statement:* Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 & 3571.

# Dilks | & | Knopik

## CERTIFICATE OF LLC RESOLUTION

The undersigned Members of Dilks & Knopik, LLC, an LLC, duly organized under the laws of Washington (hereinafter "The LLC"), hereby certify that the following resolutions were duly adopted by said Members of The LLC on June 7<sup>th</sup>, 2002 and that such resolutions have not been modified or rescinded as of the date hereof:

RESOLVED, that Brian J Dilks, Caryn M Dilks f/k/a Caryn M Knopik, Andrew T. Drake and Jeffrey Hudspeth, is hereby authorized and directed for and on behalf of The LLC to execute all legal documents as approved by him/her as being in the best interests of The LLC; and to take any and all further actions to include applying for and receiving unclaimed funds, which may be necessary or appropriate to commence and complete said construction in such a manner as being, in his/her opinion, in the best interests of the LLC.

RESOLVED, that this action may be executed in counterparts and by facsimile signatures, each of which shall be deemed an original and all of which together shall constitute one action.

IN WITNESS WHEREOF, the undersigned has executed this instrument as of this 22 day of

July, 2024.

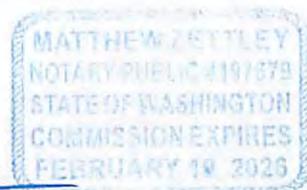
Brian J Dilks – Member

Date: 7/22/24

Subscribed and sworn to me this

7/22/2024

Notary Signature 



My Commission Expires: 2/19/2026

Caryn M Dilks f/k/a Caryn M Knopik – Member

Date: 7-22-2024

Subscribed and sworn to me this

7/22/2024

Notary Signature 



My Commission Expires: 2/19/2026





**WASHINGTON**  
Secretary of State  
Corporations & Charities Division

Filed  
Secretary of State  
State of Washington  
Date Filed: 05/14/2024  
Effective Date: 05/14/2024  
UBI #: 602 211 447

## EXPRESS ANNUAL REPORT WITH CHANGES

### BUSINESS INFORMATION

Business Name:

**DILKS & KNOPIK, LLC**

UBI Number:

**602 211 447**

Business Type:

**WA LIMITED LIABILITY COMPANY**

Business Status:

**ACTIVE**

Principal Office Street Address:

**35308 SE CENTER ST, SNOQUALMIE, WA, 98065-9216, UNITED STATES**

Principal Office Mailing Address:

Expiration Date:

**06/30/2025**

Jurisdiction:

**UNITED STATES, WASHINGTON**

Formation/Registration Date:

**06/07/2002**

Period of Duration:

**PERPETUAL**

Inactive Date:

Nature of Business:

**OTHER SERVICES, ANY LAWFUL PURPOSE**

REGISTERED AGENT [RCW 23.95.410](#)

Registered Agent Name	Street Address	Mailing Address
BRIAN DILKS	28431 SE PRESTON WAY, ISSAQAH, WA, 98027-0000, UNITED STATES	28431 SE PRESTON WAY, ISSAQAH, WA, 98027-0000, UNITED STATES

### PRINCIPAL OFFICE

Phone:

**4258365728**

Email:

**DK@DKLLC.COM**

Street Address:  
35308 SE CENTER ST, SNOQUALMIE, WA, 98065-9216, USA

Mailing Address:

#### GOVERNORS

---

Title	Type	Entity Name	First Name	Last Name
GOVERNOR	INDIVIDUAL		BRIAN	DILKS
GOVERNOR	INDIVIDUAL		CARYN	DILKS

#### NATURE OF BUSINESS

---

- OTHER SERVICES
- ANY LAWFUL PURPOSE

#### EFFECTIVE DATE

---

Effective Date:  
05/14/2024

#### CONTROLLING INTEREST

---

1. Does this entity own (hold title) real property in Washington, such as land or buildings, including leasehold improvements?  
- No
2. In the **past 12 months**, has there been a transfer of at least 16-2/3 percent of the ownership, stock, or other financial interest in the entity?  
- No
  - a. If "Yes", in the **past 36 months**, has there been a transfer of controlling interest (50 percent or greater) of the ownership, stock, or other financial interest in the entity?  
- No
3. If you answered "Yes" to question 2a, has a controlling interest transfer return been filed with the Department of Revenue?  
- No

You **must** submit a Controlling Interest Transfer Return form if you answered "yes" to questions 1 **and** 2a.

Failure to report a Controlling Interest Transfer is subject to penalty provisions of [RCW 82.45.220](#).

For more information on **Controlling Interest**, visit [www.dor.wa.gov/REET](http://www.dor.wa.gov/REET).

#### RETURN ADDRESS FOR THIS FILING

---

Attention:  
Email:  
Address:

#### EMAIL OPT-IN

---

By checking this box, I hereby opt into receiving all notifications from the Secretary of State for this entity via email only. I acknowledge that I will no longer receive paper notifications.

#### AUTHORIZED PERSON

---

Person Type:  
**INDIVIDUAL**

First Name:  
**CARYN**

Last Name:  
**DILKS**

Title:

This document is hereby executed under penalty of law and is to the best of my knowledge, true and correct.



Dilks & Knopik

When Success Matters

Brian J Dilks  
Member

35308 SE Center Street  
Snoqualmie, WA 98065  
Ph. 877-836-5728 x101  
Fx. 877-209-8249  
brian.dilks@dilksknopik.com  
www.dilksknopik.com

BBB  
accredited  
since 2003



Dilks & Knopik

When Success Matters

Andrew Drake  
Vice President - Operations

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Dilks & Knopik

When Success Matters

Caryn Knopik  
Member

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Fx. 877-209-8249  
caryn.knopik@dilksknopik.com

www.dilksknopik.com

PHOTO ID

**Affidavit of Brian Dilks  
in support of the Application for Unclaimed Funds**

The affiant hereby declares under penalty of perjury under the laws of the United States that the following is true and correct to the best of the undersigned's knowledge:

1. I, Brian J. Dilks, am at least 18 years of age and competent to submit this affidavit in support of the application for unclaimed funds being filed with this court by Dilks & Knopik, LLC;
2. We are aware of the nationwide increase in filings for Unclaimed Funds which include fraudulent evidence. This is necessarily bringing to question the identity of any filer and, as such, I want to share some things about my company and its 22-year history;
3. Every submission includes photo identification for Dilks & Knopik's authorized signers; these signers have not changed in more than 14 years;
4. We have been at the same address for 12+ years, and the phone and email information that was on our first applications, 22 years ago, will still reach us today. Dilks & Knopik does not operate from a P.O. Box or UPS store address.
5. We carry Errors and Omissions Insurance (similar coverage to professional liability insurance), so that, if my company is forced to cease operations or we were to make a collection mistake, the owed party will still be able to receive their funds;
6. Any application from my company represents the culmination of research work to locate and identify the proper signer, we wish to be known for the quality of our work and do not want to waste the court's or our own resources;
7. Dilks & Knopik, LLC was formed in 2002 by me and, my then fiancée, now wife, Caryn Knopik. We aspired to form a company that would set an industry leading standard for unclaimed funds recovery work. With this goal in mind we have adopted the following standards for ourselves and the people we employ:

- a. We will make ourselves available to our clients and partner with the court's administrators to answer questions;
- b. Prior to entering an agreement, we will share the Jurisdiction, Case Name and Number and exact dollar amount for funds we are seeking. Often, in our industry, this information is withheld until an exclusivity arrangement is reached. We believe that this is improper, and clients should be informed of all known information upfront so that, prior to proceeding with us, they have made an informed decision;
- c. Any money that is received for our clients will be promptly forwarded to them within 10 business days;

8. I am proud to be able to aver that we have recovered for our clients from all 93 Bankruptcy Jurisdictions, including Puerto Rico, the U.S. Virgin Islands and Guam, and submitted more than 20,000 applications for unclaimed funds, while maintaining our A+ rating with the Better Business Bureau.

9. Please contact us if you have any questions about our application, we will address them promptly.

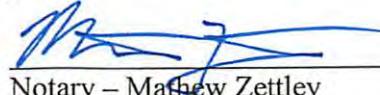
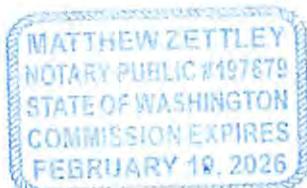
Signed at Snoqualmie, WA on June 19, 2024



Brian Dilks, Member  
Dilks & Knopik, LLC  
35308 SE Center Street  
Snoqualmie, WA 98065  
(425) 654-0346 / (877) 836-5728 x 101  
[brian.dilks@dilksknopik.com](mailto:brian.dilks@dilksknopik.com)

STATE OF WASHINGTON  
COUNTY OF KING

This Affidavit of Brian Dilks, dated 6/19/2024 was subscribed and sworn to (or affirmed) before me on this 19<sup>th</sup> day of June, 2024 by Brian J. Dilks who proved to me on the basis of satisfactory evidence to be the person(s) who appeared before me.



Notary – Mathew Zettley

MATTHEW ZETTLEY  
NOTARY PUBLIC #197679  
STATE OF WASHINGTON  
COMMISSION EXPIRES  
FEBRUARY 19, 2026

On this 4<sup>th</sup> day of March, 2025. I certify that the preceding or attached document titled (Assignment Agreement), (2 pages) is a true, accurate and complete copy of the original being held at 35308 SE Center Street, Snoqualmie, WA 98065

Dilks & Knopik

  
Matthew Zettley – Notary Public  
My commission expires: February 19, 2026

Assignment Agreement

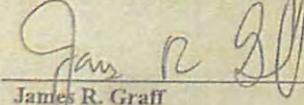
This Assignment Agreement (the "Agreement") is entered into as of February 7, 2025 (the "Effective Date") by and between Dilks & Knopik, LLC, with a principal place of business at 35308 SE Center Street, Snoqualmie, WA 98065, (the "Assignee") and James R. and Tamara A. Graff with an address of 1595 Westpark Ave, Victoria TX 77905 (the "Assignor").

1. Assignor is/was a creditor in Life Partners Holdings, Inc. (4:15-bk-40289) as filed in the Northern District of Texas (the "Case"). As a creditor in the Case, Assignor was entitled to distribution of funds from the assets of the Debtor's Bankruptcy Estate in the approximate amount of \$3,976.51 (the "Funds"). Remittance to Assignor was not successful, and pursuant to Federal Rule of Bankruptcy Procedure 3011 and 11 U.S.C. 347, the Funds were deposited into the Registry of the Court. The Funds then being subject to withdrawal in accordance with 28 U.S.C. 2042.
2. Assignor not desirous of attempting collection of the Funds, nor wishing to incur the time and expense of such collection, does hereby wish and does assign, and convey to the Assignee, for good and valuable consideration, all of Assignor's rights, title and interest in the Funds, without the presence of undue influence or coercion.

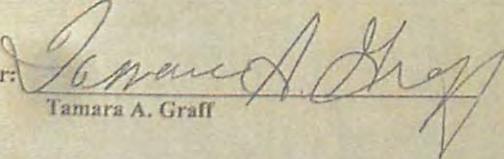
NOW THEREFORE, in consideration of mutual obligations, covenants, representations, and warranties herein, the parties agree as follows:

3. Assets Assigned: The assets herein assigned to Assignee are those stated in paragraph 1 above, that collectively are the Funds held for the benefit of Assignor by the Clerk of the Court of the court identified in paragraph 1 in the Unclaimed Funds Registry.
4. Consideration: The consideration herein given by Assignee to Assignor shall be the sum \$2,651.01 which sum shall be remitted to Assignor. A check will be issued to the Assignor for the above stated amount once this claim is approved. In the event Assignee recovers an amount over and above the Funds then Assignor shall be entitled to 100% of the additional amount recovered.
5. This assignment shall be deemed an absolute and unconditional assignment of funds/claim for the purpose of collection and satisfaction, and shall not be deemed to create a security interest.
6. Assignor represents and warrants to Assignee that no payment or other distribution has been received by or on behalf of Assignor in full or partial satisfaction of the assigned rights; that Assignor has not previously sold or assigned the rights, in whole or in part, to any party.
7. Power of Attorney: To the extent necessary under applicable law, the Assignor does hereby appoint for the limited purpose of collection of the Funds and fulfillment of Assignor's obligation(s) under this Agreement, Dilks and Knopik, LLC as its attorney-in-fact.
8. This Agreement constitutes the entire agreement and understanding between the parties with respect to the subject matter above.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed as of the day and year first written above.

Assignor:   
James R. Graff

Assignee:   
Dilks & Knopik, LLC  
Andrew T. Drake – Vice President

Assignor:   
Tamara A. Graff

# Dilks | & | Knopik

## NOTICE OF ASSIGNMENT

For good and valuable consideration, the undersigned, James R. and Tamara A. Graff ("Assignor"), hereby, assigns, conveys and transfers over and unto Dilks & Knopik, L.L.C ("Assignee"), any and all of right, title and interest in and to the below referenced funds/claim(s).

The Assigned funds/claim(s):

Debtor: Life Partners Holdings, Inc.

Court: United States Bankruptcy Court - Northern District of Texas

Case Number: 4:15-bk-40289

Chapter: 11

Claim: N/A

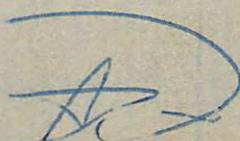
Original Creditor: James Robert & Tamara A. Graff

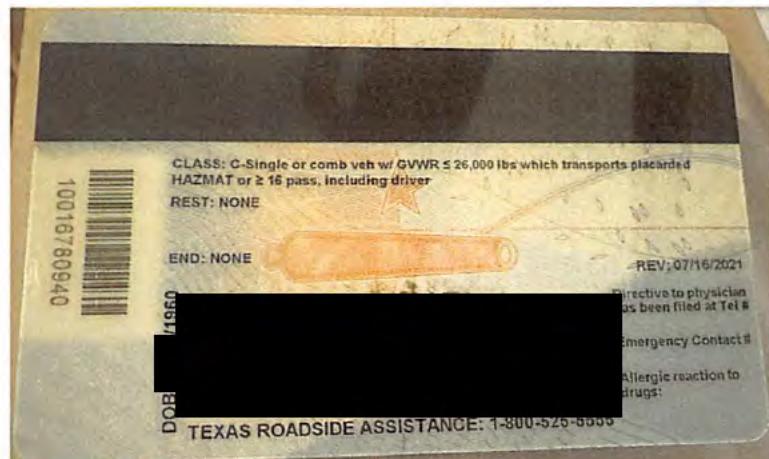
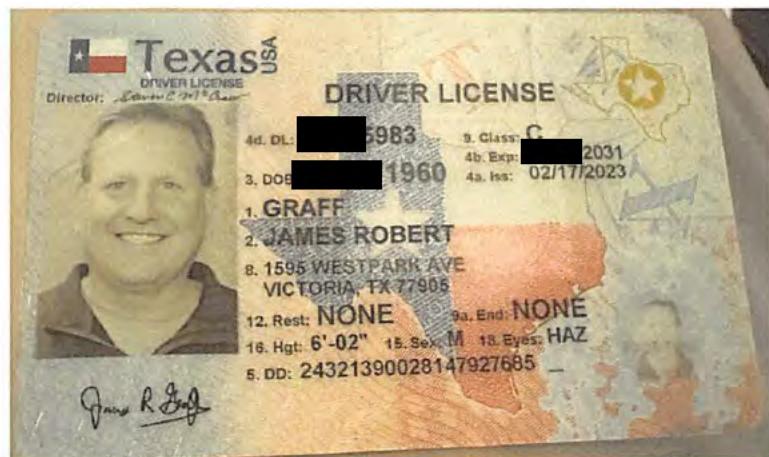
FUNDS/CLAIM(S) ARE BEING ASSIGNED "AS-IS, WHERE-IS" WITH NO WARRANTIES OR REPRESENTATIONS WHATSOEVER, EXCEPT AS EXPRESSLY PROVIDED IN THE ASSIGNMENT AGREEMENT, INCLUDING, WITHOUT LIMITATION, WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.

IN WITNESS WHEREOF, the parties hereto have caused this notice of assignment to be executed as of the Friday, February 07, 2025.

X James R. Graff  
James R. Graff

X Tamara A. Graff  
Tamara A. Graff





Address Proof  
Of Record

Photo ID



Address Proof  
Of Record

Photo ID